

MDEQ Public Hearing on Proposed Co.R. 595  
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I have several comments regarding proposed Co. Rd. 595 from Kennecott's Eagle Project to Humboldt Mill.

For the reasons below, I don't believe the construction of Co. Rd. 595 is either in the public interest or prudent, and a viable alternative does exist.

First, Kennecott will need to use existing routes ( Triple A, Co Rd. 550, U.S. 41) until the proposed road can be built, and Triple A has already been improved. The City of Marquette is beginning construction of an extension of McClellan Ave. to Wright Street, which will provide a shortened route through Marquette. The estimated cost of 595 (about \$80M) is about the same what is needed to repair existing county roads. Kennecott will only guarantee payment for 595 construction if it can begin by Spring, 2013, which is a very ambitious schedule. Who pays if Kennecott doesn't?

Kennecott estimates (Kennecott Transportation Report) that 12 maintenance workers will be required to maintain 595 after construction. The MCRC would presumably be paying for these workers (\$300,000 at \$25,000 each). Given the present unmet needs for maintenance and repair, this is significant.

Second, the environmental consequences to wetlands are only slightly less than those in the original Woodland Road plan. The EPA, U.S Fish and Wildlife Service, and the Corps of Engineers all recognised that this is was unacceptable if another route already exists. Further, the paving of 22 miles of 32 foot highway with shoulders and fill to grade will leave a 200 acre footprint through this essentially roadless area. The present fenced area of the Kennecott Eagle Project is 120 acres, so this almost doubles the affected area. This was not in the original Mining Permit Proposal.

The road and Humboldt Mill should be considered under one comprehensive Environmental Impact Study so that the full consequences

of the mining operation can be assessed.

I oppose the granting of the MDEQ permit for construction of Co. Rd. 595. Thank you for this opportunity to comment.